## WESTERMAN BALL EDERER MILLER ZUCKER & SHARFSTEIN, LLP

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January 21, 2021

**By ECF and Electronic Mail** 

Honorable John P. Cronan
United States District Court
Southern District of New York
Federal Building and United States Courthouse
500 Pearl Street, Room 1320
New York, New York 10007
CronanNYSDChambers@nysd.uscourts.gov

It is hereby ORDERED that the Initial Pretrial Conference scheduled for February 1, 2021 is ADJOURNED to March 9, 2021 at 12:00 p.m. The parties shall have until March 2, 2021 to submit the joint letter outlined in the Court's November 12, 2020 Order.

SO ORDERED.

Date: January 21, 2021 New York, New York

JOHN P. CRONAN United States District Judge

Re: Interiano v. Crothall Facilities Management, Inc., et al.

Case No.: 20-CV-8895 (JPC)

Dear Honorable Cronan:

We are counsel to the defendants Crothall Facilities Management, Inc., and Crothall Healthcare, Inc., (hereinafter collectively referred to as "Crothall") in the above-referenced action. We write jointly with plaintiff's counsel to request an extension of time to submit a joint letter as well as a proposed case management plan and scheduling pursuant to Section 5. B. of Your Honor's Individual Rules and Practices ("Rules") in addition to an adjournment of the Initial Pretrial Conference ("IPTC").

The IPTC is scheduled for February 1, 2021. The deadline to comply with the directives of Section 5. B. of Your Honor's Rules is January 25, 2021, which is seven days prior to the IPTC. We request that the new IPTC be scheduled for March 1, 2021 and the deadline for Rule 5.B. submissions be February 22, 2021. We make this joint request for an extension of time pursuant to Section 3. B. of the Rules because the parties have exchanged initial discovery material and have been cooperatively discussing the course of the matter. This is the first request made for such an adjournment. All counsel consent to this request.

Thank you for your time and attention to this matter.

Respectfully submitted,

William E. Vita

WEV/JAI

cc: All Counsel of Record (By ECF and Email)